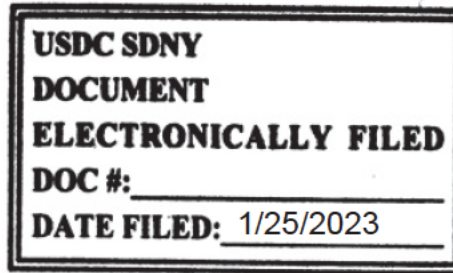


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Via ECF

January 24, 2023

The Honorable Robert W. Lehrburger
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *In re Application of Forensic News LLC & Scott Stedman*, No. 22-MC-0229

Dear Judge Lehrburger:

Pursuant to Rule III(D) of Your Honor's Individual Practices, we write as counsel to independent news organization Forensic News LLC and its founder Scott Stedman ("Petitioners") to respectfully request that the unredacted version of the attached letter motion to the Court be filed temporarily under seal pending the parties' meet and confer required by Your Honor's rules.¹

In the letter motion, Petitioners summarize the deposition testimony of Mark Rossini, whose deposition was taken on January 13, 2023. Mr. Rossini has taken the position that the deposition testimony contains confidential information. He requested, and Petitioners' counsel agreed, that the testimony remain confidential for a period of two weeks after receipt of the rough deposition transcript, to allow Mr. Rossini time to assess his confidentiality concerns. Mr. Rossini's counsel received the rough deposition transcript on January 18, 2023.

We thank the Court for its kind consideration.

Sincerely,

GIBSON, DUNN & CRUTCHER LLP

s/ Anne Champion
Anne Champion

cc: All counsel of record (via ECF)

Granted.

SO ORDERED:

1/25/2023

A handwritten signature in black ink, appearing to be "R. Lehrburger".

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE

¹ Although Your Honor's rules do not require the filing of an application to seal, we understand that the ECF system prohibits filing a document under seal absent a court order or a pending motion to seal.